

EXHIBIT F

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SHERYL MILLER,

Plaintiff,

v.

Civil Action No.

WILLIAM BEAUMONT HOSPITAL dba

3:21-cv-12259

BEAUMONT HEALTH SYSTEM,

Defendant.

VIDEOCONFERENCE DEPOSITION OF

RENEE LABO

DATE: Tuesday, April 11, 2023

TIME: 1:10 p.m.

LOCATION: Remote Proceeding

2000 Town Center, Suite 1650

Southfield, MI 48075

REPORTED BY: Priscilla Gibbs, Notary Public

JOB NO.: 5866431

A P P E A R A N C E S

ON BEHALF OF PLAINTIFF SHERYL MILLER:

AUSTEN J. SHEAROUSE, ESQUIRE (by videoconference)

Carla D Aikens, P.L.C.

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Detroit, MI 48226

austen@aikenslawfirm.com

(469) 999-6577

ON BEHALF OF DEFENDANT WILLIAM BEAUMONT HOSPITAL dba
BEAUMONT HEALTH SYSTEM:

ELYSE K. CULBERSON, ESQUIRE (by videoconference)

Jackson Lewis PC

2000 Town Center, Suite 1650

Southfield, MI 48075-1146

elyse.culberson@jacksonlewis.com

(248)936-1900

ALSO PRESENT:

Jennifer Zinn, In-House Counsel (by
videoconference)

Roseanna Von Linsowe, Corporate Representative
for Beaumont (by videoconference)

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I N D E X

EXAMINATION:	PAGE
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E X H I B I T S

NO.	DESCRIPTION	PAGE
	(None marked.)	

P R O C E E D I N G S

THE REPORTER: Good afternoon. My name is Priscilla Gibbs; I am the reporter assigned by Veritext to take the record of this proceeding. We are now on the record at 1:10 p.m.

This is the deposition of Renee LaBo taken in the matter of Sheryl Miller vs. William Beaumont Hospital doing business as Beaumont Health System on Tuesday, April 11, 2023, via Zoom.

I am a notary authorized to take acknowledgments and administer oaths in Michigan. Parties agree that I will swear in the witness remotely. Someone just dropped off.

MS. LABO: Yep. I think it was me. Sorry.

MS. CULBERSON: Are you able to turn your camera back on?

MS. LABO: Okay. Hold on. I don't know what happened.

MS. CULBERSON: If your phone rings, I know sometimes that will, like, make the Zoom disappear.

MS. LABO: Okay. Hold on.

THE REPORTER: All right. I am a notary authorized to take acknowledgments and

1 administer oaths in Michigan. Parties agree that I
2 will swear in the witness remotely.

3 Additionally, absent an objection on
4 the record before the witness is sworn, all parties
5 and the witness understand and agree that any
6 certified transcript produced from the recording of
7 this proceeding:

- 8 - is intended for all uses permitted
- 9 under applicable procedural and
- 10 evidentiary rules and laws in the same
- 11 manner as a deposition recorded by
- 12 stenographic means; and
- 13 - shall constitute written stipulation
- 14 of such.

15 At this time will everyone in
16 attendance please identify yourself for the record.

17 MR. SHEAROUSE: Austen Shearouse on
18 behalf of the plaintiff, Sheryl Miller.

19 MS. CULBERSON: Elyse Culberson on
20 behalf of the defendant. Here with me this afternoon,
21 is also Jennifer Zinn, in-house counsel for defendant,
22 as well as -- did we lose her? Sorry.

23 THE REPORTER: Looks like she dropped
24 off again.

25 MS. CULBERSON: Okay.

1 THE REPORTER: Okay. I'm going to go
2 off the record until she returns. Oh, it looks like
3 she's here.

4 MS. LABO: Okay. Sorry, guys.

5 MR. SHEAROUSE: No worries.

6 THE REPORTER: Are we okay with her
7 camera off?

8 MS. CULBERSON: Yeah. Renee, I don't
9 know if you can get back on camera.

10 MS. LABO: Is it the wrong way?

11 MR. SHEAROUSE: It is.

12 MS. CULBERSON: Now it's working.

13 MS. LABO: Okay.

14 THE REPORTER: All right. At this
15 time, will everyone in attendance please identify
16 yourself for the record again.

17 MR. SHEAROUSE: Yep. Austen Shearouse
18 on behalf of the plaintiff.

19 MS. CULBERSON: Elyse Culberson on
20 behalf of the defendant, along with Jennifer Zinn,
21 in-house counsel for defendant, as well as Roseanna
22 Von Linsowe, Defendants Corp Representative.

23 MS. LABO: Renee LaBo.

24 THE REPORTER: Thank you. Hearing no
25 objections, I will now swear in the witness. Please

1 raise your right hand.

2 WHEREUPON,

3 RENEE LABO,

4 called as a witness, and having been first duly sworn
5 to tell the truth, the whole truth, and nothing but
6 the truth, was examined and testified as follows:

7 THE REPORTER: Thank you.

8 EXAMINATION

9 BY MR. SHEAROUSE:

10 Q Good afternoon. As I said, my name is
11 Austen Shearouse, and I represent Sheryl Miller in
12 this matter. Just a couple of quick things to go
13 over. Have you ever had your deposition taken before?

14 A No.

15 Q So especially with it being Zoom, as the
16 court reporter said, give a couple of seconds after I
17 finish my question and I'm going to try to do the same
18 for your answer. So that way it makes it easy for
19 them to record the entire record down accurately.

20 Along with that, make sure any response that
21 you give is verbal. Sometimes we have a tendency to
22 nod our head, point, speak with our hands, but
23 obviously the court reporter can't take that kind of
24 stuff down. So just make sure that any answer you
25 give to a question is verbal.

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1 If you don't understand a question, I'm
2 happy to rephrase or restate the question. But if you
3 respond and answer to a question, I'm going to assume
4 that you understood it.

5 If at any point in time you need a break,
6 I'm happy to do that. All I ask is that if myself or
7 Elyse has posed a question to you on the record, we
8 answer that question before we take that break. This
9 is not an endurance test, so if you need it for any
10 reason, please just let us know.

11 And if you don't know the answer to a
12 question, I don't want you to guess to something that
13 you can't attest to. "I don't know" is a completely
14 acceptable answer. So if you can't really remember
15 one way or the other, "I don't know" is completely
16 fine. All right. Can you state your full name for
17 the record, please?

18 A Renee LaBo.

19 Q And what is your date of birth?

20 A I'm sorry?

21 Q What is your date of birth?

22 A Oh, April 23, 1972.

23 Q And are you currently employed?

24 A Yes.

25 Q Where are you employed?

1 A Beaumont Family Medicine in Newport,
2 Michigan.

3 Q And what is your role at Beaumont in
4 Newport?

5 A I'm sorry. Say that again.

6 Q What is your role at that Beaumont office?

7 A I'm a business office assistant. I work the
8 front desk.

9 Q And have you always worked at that location
10 during your time at Beaumont?

11 A No.

12 Q What other locations have you worked at?

13 A I used to work at the Trenton campus for
14 Beaumont.

15 Q Do you know roughly what date you moved from
16 the Trenton location to the Newport location?

17 A March of this year.

18 Q Was there a particular reason for that move?

19 A I just needed a change.

20 Q Kind of mixing things up?

21 A Yeah. Well, no holidays, no weekends.

22 Q So the schedule is a little bit better at
23 the Newport Family Medicine office?

24 A Yes.

25 Q Any other reasons for that move?

1 A No.

2 Q And while you were working at the Trenton
3 location, what was your role there?

4 A I worked in registration.

5 Q Was there a particular area of registration
6 that you worked in?

7 A I did the ER. I also did outpatient imaging
8 and the Breast Care Center.

9 Q And when did you start in that role at the
10 Trenton location?

11 A I believe it was 2013. I hired in as a
12 contingent.

13 Q And then at some point you became a fulltime
14 employee?

15 A Yes, sir.

16 Q And do you know roughly what time that
17 changed from contingent to fulltime occurred?

18 A Oh, it was -- I can't say offhand. I'll say
19 maybe two years.

20 Q Two years. So sometime maybe 2015, 2016?

21 A Possibly, yes.

22 Q Okay. And so you mentioned that you worked
23 in the ER, radiology, outpatient, and the Breast Care
24 Center; is that correct?

25 A Yes.

1 Q When did you start working at the Breast
2 Care Center?

3 A I don't remember an exact date. We all took
4 turns over there.

5 Q Was it always a rotating schedule for those
6 who worked at the Breast Care Center?

7 A I believe so.

8 Q When the COVID pandemic really got into full
9 swing around March of 2020, was the Breast Care Center
10 still open?

11 A That I don't know. I wasn't over there at
12 that time.

13 Q Okay. Was there ever a point in time that
14 you only worked at the Breast Care Center?

15 A Yes. I was a regular over there for
16 registration.

17 Q Do you know roughly what that date would
18 have been for you being the regular at that
19 registration area?

20 A I do not.

21 Q And prior to March of 2020, had you ever
22 done registration in the Breast Care Center?

23 A Yes. I had filled in over there time to
24 time.

25 Q And prior to March of 2020, do you know if

1 there was anybody who regularly worked in the Breast
2 Care Center?

3 A I do believe there was a co-worker of ours
4 that was there on a regular basis.

5 Q Do you know their name?

6 A Jan Robinson.

7 Q And in March of 2020, there was an email
8 that went out concerning the use of N95 masks to the
9 PAR; is that correct?

10 A I believe so, yes.

11 Q Do you remember what the contents of that
12 email were?

13 A I do not.

14 Q If I said that the email said that the
15 Beaumont was reserving N95 masks for nurses and people
16 on the front lines, would that sound about right?

17 A It may have. I don't recall.

18 Q Do you recall if there was any prohibition
19 on someone bringing their own personal N95 masks from
20 home?

21 A I do not.

22 Q Did you ever work with Sheryl Miller?

23 A I did.

24 Q And did you work with her prior to March of
25 2020?

1 A I believe so. I don't know when Sheryl came
2 aboard.

3 Q And if I told you that Sheryl was working in
4 the Breast Care Center doing registration in that area
5 primarily before the pandemic, would you have any
6 reason to disagree with that?

7 A I don't, but I don't remember exact dates.

8 Q Okay.

9 A Sorry, guys. My phone keeps cutting out.

10 Q It's okay. It happens.

11 A I'm sorry.

12 Q Things are outside your control. I
13 understand. So earlier we mentioned that you had kind
14 of filled in from time to time in the Breast Care
15 Center, but then there was a period of time that you
16 were regularly scheduled there; is that correct?

17 A Yes.

18 Q Did someone contact you about switching to a
19 more permanent role in the Breast Care Center?

20 A No. It's just how they put it down on the
21 schedule.

22 Q So no one ever reached out and said, "Hey,
23 we're moving you over to the Breast Care Center for a
24 more permanent position"?

25 A Not that I recall. No.

1 Q Okay. No one ever gave you the choice of
2 being put in that position?

3 A Not that I recall.

4 Q And prior to that regular scheduling in the
5 Breast Care Center, you would only cover shifts in
6 there as needed?

7 A Right.

8 Q When you were being regularly scheduled in
9 the Breast Care Center, was there any change in your
10 ability to work in the other areas?

11 A No.

12 Q So there wasn't any health concerns that
13 required you to be in the Breast Care Center?

14 A No.

15 Q And I want to learn a little bit more about
16 what the -- so what would a typical day look like in
17 the Breast Care Center for your job responsibilities?

18 A I would call the patient into the
19 registration little booth area, ask them their name,
20 their date of birth, confirm all of their personal
21 information, address, phone number, that type of
22 thing, verify their health insurance. And then it
23 would print out their band that we would put on, their
24 identifier band. It would print out labels that the
25 techs would use to -- whatever they used in the back.

1 And that was pretty much it.

2 Q And did that differ from your time being
3 regularly scheduled in the ER?

4 A No. We verified the same. It was the same
5 verified patient information, address, phone number,
6 insurance.

7 Q Is the layout of the areas the same as well?

8 A What do you mean?

9 Q Just because you said you would call
10 somebody into the area where you would verify them.
11 I'm trying to learn a little bit more about that
12 that's like and visualize it.

13 A Oh, It's just, like, a small little, like, a
14 cubicle for like privacy purposes. In the ER, when
15 you registered a patient once they were brought back
16 into the to the main ER, we would go into what we
17 would call "bedside" and go into their room in the ER
18 and verify their information that way.

19 Q And was that still the process of
20 verification during the height of the COVID pandemic
21 between March of 2020 and July of 2020, roughly?

22 A Not that I recall. I know we verified --

23 Q Would you say --

24 A I don't --

25 Q Oh, sorry.

1 A No. Go ahead.

2 Q Would you say you would see more patients in
3 the Breast Care Center or the ER?

4 A Well, the Breast Care Center is -- it's a
5 scheduled appointment. And there's -- the Breast Care
6 staff made their schedule, so I had no control over
7 how many people they saw in a day, just like you don't
8 have control over how many come into the ER.

9 Q Okay. So if you had to pick one on average,
10 which of those two areas would be typically more busy
11 with patients?

12 A If I had to choose as an outsider looking
13 in, I would say the ER is probably always busier than
14 a department because you can control the amount of
15 people that come into your department for an
16 appointment.

17 Q And so the Breast Care Center is only by
18 scheduled appointment. There isn't an ability for
19 someone to walk in?

20 A It is -- correct. It is not a walk in. You
21 have to be scheduled for a mammogram or a breast
22 ultrasound or a biopsy or whatever they do back there,
23 yes.

24 Q Okay. And then obviously the ER can kind of
25 just flux with people walking in?

1 A It's walking and ambulance traffic.

2 Q And once COVID was kind of in full swing --
3 again, anytime I'm referring to kind of the height,
4 I'm always referring to this time period between March
5 of 2020 and July of 2020. Did Beaumont start doing
6 curbside check-ins as well?

7 A What do you mean by curbside check-in?

8 Q Was there any, like, registration going on
9 curbside? I'm just trying to kind of understand, I
10 guess, what the -- if there was any change in how
11 people were registered in the ER during COVID.

12 A From what I recall, the nursing staff would
13 go out to the car that was in the line for the drive
14 through COVID. They would bring us their
15 identification and health insurance card. And then we
16 would input their information, print the band for the
17 patient and the labels for the nursing staff so that
18 they could proceed with whatever they were doing.

19 Q Okay. So the initial registration was being
20 done by via the nurses handing you the information and
21 then they would take the band to the patient?

22 A From what I recall that -- we did that for a
23 short period, yes.

24 Q Okay. Do you recall the dates that was
25 going on?

1 A I do not. I'm sorry.

2 Q That is okay. And then during your time
3 with Beaumont and after COVID, did the Breast Care
4 Center ever permanently close to your knowledge?

5 A Not as far as I know, it never permanently
6 closed.

7 Q Did you ever stop being regularly scheduled
8 in the Breast Care Center?

9 A No.

10 Q So you worked at the Breast Care Center all
11 the way through March of 2023?

12 A Well, I worked over there and -- well, they
13 changed. And they pulled registration out of the
14 Breast Care Center, and the staff from the Breast Care
15 Center now does their own registration. So there is
16 no registration staff from my old department over
17 there registering patients.

18 Q Understood. So that switched over purely to
19 the Breast Care Center staff and no one from PAR goes
20 --

21 A Right.

22 Q Do you know roughly what year that happened?

23 A I'll say within the last maybe year, year
24 and a half.

25 Q Okay. So mid of 2022, early 2022?

1 A Possibly.

2 Q Okay. In the times that you worked with
3 Sheryl Miller, did she ever bring up any complaints
4 about how she would -- involving other coworkers or
5 managers?

6 A Not to me, she never did.

7 Q Okay. Did you ever witness any arguments
8 between her and any coworkers or managers?

9 A No.

10 MR. SHEAROUSE: All right. I don't
11 think I have anything further this time.

12 MS. CULBERSON: I have no questions.

13 MR. SHEAROUSE: Okay. Well, Renee, it
14 was a pleasure. Thank you for your time. We're not
15 going to keep you all day. So thank you so much for
16 taking time out of your day to answer some questions
17 for us.

18 THE WITNESS: Sure. Thank you.

19 MR. SHEAROUSE: Of course.

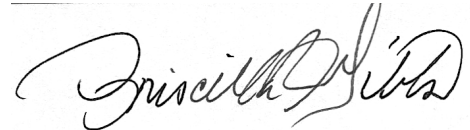
20 MS. CULBERSON: Thanks, Renee. Take
21 care.

22 THE REPORTER: We're now off record at
23 1:33 p.m.

24 (Whereupon, at 1:33 p.m., the
25 proceeding was concluded.)

CERTIFICATE OF DEPOSITION OFFICER

I, PRISCILLA GIBBS, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



PRISCILLA GIBBS

Notary Public in and for the
State of Michigan

CERTIFICATE OF TRANSCRIBER

I, ANDEE WILCOX, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



ANDEE WILCOX

[11 - break]

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[drive - july]

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[rephrase - transcriber]

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[transcript - zoom]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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